

**From:** [Michael PINTO](#)  
**To:** [Bury, Carolyn](#)  
**Subject:** RE: Letters  
**Date:** Friday, November 22, 2013 11:05:52 AM

---

It is the Arkema site, the current owner is "Arkema Inc."

Michael Pinto  
RETIA USA LLC/Legacy Site Services LLC  
468 Thomas Jones Way, Suite 150  
Exton, PA 19341  
Office: 610 594-4435  
Fax: 610 594-4439



---

**From:** Bury, Carolyn [<mailto:bury.carolyn@epa.gov>]  
**Sent:** Friday, November 22, 2013 11:33 AM  
**To:** Michael PINTO  
**Subject:** RE: Letters

So, currently, is it more accurate to refer to the site as Total, Arkema East Plant, or LSS?

---

**From:** Michael PINTO [<mailto:michael.pinto@total.com>]  
**Sent:** Friday, November 22, 2013 9:19 AM  
**To:** Bury, Carolyn  
**Subject:** RE: Letters

Yes, I'll send you the ownership history. In general, it was Pennwalt, Atochem, Elf Atochem, Elf Atochem N.A., Atofina, Arkema. All were successors of the same entity. I'll get you the formal names of each company. I will also have someone go to the site and investigate what's going on with the hole in the picture. It appears to be a surface water drain, but I will have this confirmed. LSS is the exclusive agent of Arkema. We are not a contractor. When Total, a French oil company, spun off Arkema, a French chemical company, it retained the liability for specific non-operating sites, including the East Plant, through a indemnity. Legacy Site Services is the subsidiary of Total that administers this indemnity. I will send you a more formal description of this relationship along with the formal chain of ownership.

Michael Pinto  
RETIA USA LLC/Legacy Site Services LLC  
468 Thomas Jones Way, Suite 150  
Exton, PA 19341  
Office: 610 594-4435  
Fax: 610 594-4439



---

**From:** Bury, Carolyn [<mailto:bury.carolyn@epa.gov>]

**Sent:** Friday, November 22, 2013 9:57 AM  
**To:** Michael PINTO  
**Subject:** RE: Letters

Hi Mike,

I'll just send you a letter asking that the monitoring be continued.

Say, when you get a chance in the next few weeks, could you please send me a brief synopsis of the property ownership since Pennwalt Corporation (AOC), including the entire formal name of each company, which I need for the Statement of Basis? You know, I can't recall what the exact relationship is between Legacy Site Services and Arkema - are you contracted to Arkema or an arm of Arkema? At one time I looked up Arkema and found that the company is headquartered in Lyon, France, and is a French-owned company. Is that correct?

Also, please confirm that the photo of the seawall, attached, shows a weep hole drilled for storm water management. I think that the vegetation hanging down suggests that the top of the wall may be two or so feet from the hole.

Thanks!

Carolyn

---

**From:** Michael PINTO [<mailto:michael.pinto@total.com>]  
**Sent:** Friday, November 22, 2013 8:11 AM  
**To:** Bury, Carolyn  
**Subject:** Letters

Carolyn,

I did find your letter and our response. Pete Swanson at CRA recalls that we discussed the results of the 2010 sampling with you and we concluded that additional sampling could be deferred until the CMS was approved and the long term monitoring plan was implemented. This was predicated on the CMS being approved shortly after our conversation. I don't remember any of this and CRA's recollection doesn't quite make sense to me. Either way, if you prefer we can send you a letter stating that we will resume sampling as requested in your 2010 letter and propose a schedule and report format, or you can send us a letter describing what you want.

Michael Pinto  
RETIA USA LLC/Legacy Site Services LLC  
468 Thomas Jones Way, Suite 150  
Exton, PA 19341  
Office: 610 594-4435  
Fax: 610 594-4439



